Sylvia M. Winters

P.O. Box 2731 Sarasota, Florida 34230 (813) 377-2910

October 24, 1994

Honorable Reed E. Hundt Chairman Federal Communications Commission Room \$14 1919 M. Street, NW Washington, DC 20554

Dear Mr. Hundt:

As a lifetime resident of Sarasota and as my ancestors settled this area in the 1840's, I feel I have the <u>fight</u> to speak out for the Sarasota/Manates area.

As a young girl, I can remember our only television coverage being from Tampa. We felt so telt out when it was time for the news because nothing was of concern to us and it seemed as though we were a million miles away. Our local news and special events were seldom if ever covered. I can still remember the excitement when we finally got our own station. Channel 40. It was also a wonderful treat that it was an ABC Affiliate as that was our favorite.

What a travesty it will be if we lose this affiliation. There is no way, I repeat, no way that any Tampa or St. Petersburg station can ever do our area justice nor will it ever seem right to not have our local station. The face of this community will be forever changed.

Please take into consideration this wonderful community and its needs and what it rightfully deserves when the decision to cancel Channel 40 is made. We implore you to not let ABC do this injustice to us.

Thank you for whatever you can do to help us.

Sincerely.

Sylvia M. Winters

cc: Sam Antar, Esq.

Donald P. Zeifang, Esc.

allette

Stan Crumley

"Specializing in Aerontological Services"

WEATHER

4634 Little John Trail Sarasota, Florida, 34232 October 11,1944

Honorable Reed E. Hundt Chairman Federal Communications Commission Room 814 1919 M Street, NW Washington, DC 20554

Dear Sir:

I am writing to you concerning our local television station WWSB, Channel 40, in Sarasota, Florida. I have been a resident in Sarasota for the past 12 years. During that time, my children have gone through their school years and are presently attending

college and in their final years in Sarasota High School.

I have been an avid viewer of Sarasota's local station during these years and have come to depend on them for all local news, local weather, local selvertisers and local interests. I have also tuned into the Tampa station and have watched while their main news stories, advertising and cultural activities are focused on Tampa areas including littleborough County, Pinelles County, and those counties to their north and west, but vary rarely concerning the counties to the south, melnly Bradenton and Sarasota Counties.

I have come to depend on WWSB, Channel 40 for any news concerning school, political activities, local hometown activities and especially the weather. While WWSB can alort Serzeotz area viewers to possible dangerous weather, which at times we do have, we cannot depend on Tampa stations to help this area. In the past, the only times the Tampa stations issue warnings are when it concerns only the Tampa area, usually the bad weather has already bit and gone past Serzeotz area with no warnings from the Tampa stations at all. This is just one small but major part of the necessity of having a local hometown station.

I am hoping that you will greatly consider the needs of the Sarasota, Bradenton and Venice area residents while you are deciding to take away our fies to the Foutside World".

Sincerely,

Ellen M. Weinberg

cc Sam Antar, Esq.
Counsel for Capital Cities/ABC, Inc.

Donald P. Zelfang, Esq. Counsel for Scripps Howard Broadcasting Co.

2 Stan Crumley
President & General Munager, WWSB, Channel 40

October 17, 1994

The Honorable Reed E. Hundt Chairman Federal Communications Commission Room 814 1919 M Street, NW Washington, DC 20554

Dear Mr. Hundti

It was with dismay that I recently learned that the town of Sarasota, Florida, will soon lose the local television's (WW\$8, Channel 40's) affiliation with ABC. Our community will soon lose its identity, we will no longer be able to enjoy local programming such as news, aports, and (extremely critical due to frequent dangerous storms and hurricanes), weather.

Channel 40 has been a unique hometown television station for over 23 years. Everyone I know watches the local news programs on Channel 40. Local programming informs us about environmental concerns, business development, crime, theatre, etc. Channel 40's "Hurricane Watch" programs are crucial to our eafety during times of severe veather conditions. Although Tamps is just a short distance from Sarasota our weather is often quite different, so we cannot learn about our weather by watching a television station's weather reports from Tampa. We have learned that by experience. We know we can rely on Channel 40 for news of local deadly waterspouts, tornados spotted in the local area, evacuation news, etc. So you see, Mr. Hundt, it is not an overstatement to say that losing our local programming could mean the difference between life and death for many Sarasota residents,

It seems unfair to me that a large television company such as ABC can callously trade away our link with the local community news to Scripps Howard. Are there any laws to protect us? If not, should there be laws to protect us?

I am pleading with you and the FCC to do all you can to help our small (but concerned and viable) community retain local television service through a continued affiliation with ABC.

Thank you for your consideration.

Sincerely,

Lieble Johnson

Lucille Johnson 7491 Carnoustie Drive Sarasota, FL 34238-2810

Telephone: (813) 925-9006

SANDLEHEATH CONDOMINIUM ASSOCIATION, INC. 4939 RINGWOOD MEADOW 8ARASOTA, FLORIDA 34235

October 17, 1994

Honorable Reed E. Hundt, Chairman Federal Communications Commission 1919 M Street NW - Room 814 Washington, DC 20554

Dear Monorable Hundt:

As the president of the Sandleheath Condominium Association I must strongly convey the feelings of our \$6 member families about what is happening to our local station WWSB channel 40 in Sarasota to you.

As you know WWSB has been part of the ABC network for eyer 20. Years. We in Sarasota depend on them for our local news and weather. The chance of losing this outlet would be devastating to this community.

We in Sarasota are not a suburb of Tampa. We are 50 miles away and have nothing in common with Tampa. The stations in Tampa compete against each other for Tampa news and weather, they give almost no mention of anything happening in Sarasota.

WWSB is very active in our community, involved in many charity events for the Sarasota area. During the violent weather we have in Florida we count on WWSB for urgent weather information especially during hurricane season when lives are at stake.

Please give the people of the Sarasota area their due by forcing ABC to keep WWSB as an affiliate.

Thank you very much.

Days Wenter

Yours truly.

George Feintuch, President

Sandleheath Condominium Association, Inc.

cc: Sam Antor, Esq.
Donald P. Zeifang, Esq.
Stan Crumley

ENTERPRISE NATIONAL BANK OF SARASOTA

November 16, 1994

Honorable Reed E. Hundt Federal Communications Commission 1919 M Street, N.W. Room 814 Washington, D.C. 20554

Re:

WWSB- Channel 40 ABC Affiliation

Dear Mr. Hundt:

I am writing in my capacity of President of Enterprise National Bank of Sarasota, Florida to express our concern regarding ABC's announcement of ending its 23 year affiliation with WWSS Channel 40 of Sarasota, Florida.

The loss of Channel 40's major network attiliation will eliminate the station's ability to provide local programming and affordable advertising for local businesses. This is of concern to us because it impedes the Sarasota community's ability to respond to disaster situations i.e. huricanes. For example, locally, tropical storm Gordon is threatening our area, and WWSB has been providing timely and thorough coverage of the storm. The Tampa stations have only carried it in the larger context of news in Florids.

Further, the public's interest is damaged because this action, if allowed to stand, will severely impair the community's ability to communicate on local issues important to the public. This action by ABC would damage WWSB, an institution that has supported a myriad of causes for the benefit of the public interest. Further, as a small business we will be forced out of the option of advertising on television to reach our market because of the astronomical cost of Tampa television stations is prohibition to a small business.

Finally, it is absolutely inconceivable that the public's information needs can be met from Tampa/St. Petersburg. In-depth reporting and analysis if news, public affairs and weather relevant to Sarasotal would be virtually eliminated. For the sake of this community, we hope you won't allow this proposed action by ABO to stand.

Sincerely.

Trammell Hudson

President

TH:cja

OC:

Sam Antar, Esquire
Counsel for Capital Cities/ABC Inc.
77 West 66th Street
New York, New York, 10023

Counsel for Scripps Howard 1050 Connecticut Avenue, N.W. Washington, D.C. 20036 Stan Crumley, President and General Manager
WWSB, Channel 40
5725 Lawton Drive
Barasota, Florida, 34233

David L. May, President
Greater Sarasota Chamber of Commerce
V. 1819 Main Street, Suite 240
Sarasota, Florida 34236
Main Office: 1549, Ringling Boulevard

Daine . 2760 Gulf Gate Drive at Beneva Road



ARTHUR ANDERSEN & CQ 5C

November 21, 1994

Honorable Reed E. Hundt Federal Communications Commission Room 814, 1919 M St. N.W. Washington, DC 20554 Arthur Anderson LLP

2805 Fruitville Road Sarasota FC 34237-5318 1 813 365 9469 1 800 USA 1040

Dear Mr. Hundt

I am writing in support of Sarasota TV station WWSB's efforts to retain their ABC affiliation. Should they be unable to retain network affiliation, it will indeed be a great loss to our community.

WWSB, as an affiliate, has the resources to provide outstanding and needed coverage of local weather, as well as local news, information, and civic events. As a Gulf Coast community, weather coverage is critical on a local level; witness WWSB's monitoring and round-the-clock information updates on Tropical Storm Gordon this past week. We need a local weather team to monitor local conditions; not rely on coverage by stations serving the Tampa/St. Petersburg metro area many miles away.

WWSB also provides an invaluable service to the community, not only in news coverage, but also in participation through sponsorship; working with and getting out into the Sarasota community. Their consistent support of local events, charities, festivals, and sporting events would regrettably be lost, or at best diminished if they were to lose the resources of their ABC affiliation. We need this kind of local involvement and coverage to keep area residents abreest of what's new and happening, and encourage the growth and development of the Sarasota-Manatee area.

The ability of local businesses and advertisers to reach their local market would also be impaired. It would make little sense, or be economically out of the reach of many to advertise from outside the viewing area at the higher, larger market rates.

Finally, the stature of national network affiliation and its concomitant resources allowing indepth local coverage, has helped stimulate the growth of Sarasota-Bradenton as a major market for businesses, residents, and visitors alike.



ARTHUR ANDERSEN & CO. SC

San Antar, Esq. Page 2 November 21, 1994

As a business leader in Sarasota, I urge you to consider a favorable ruling for WWSB. The impact on residents and business must be considered, and only a positive outcome can continue to assure WWSB's enormous contribution to the success, safety, and dynamic future of our area.

Very truly yours,

ARTHUR ANDERSEN LLP

By

Rodger L DeRose

WLR

Copies to: Sam Antar, Esq. Counsel for Capital Cities/ABC Inc.

Donald P. Zeifang, Esq.
Counsel for Scripps Howard Broadcasting Co.

Stan Crumley, President and General Manager WWSB, Channel 40

David L. May, President Greater Sarasota Chamber of Commerce COL JAMO C. POWELL, USA (RET)

4614 TRAILS DRIVE

\$ARASOTA, 14, 34232

October 20, 1994

Honorable Reed E. Hundt Chairman Federal Communications Commission Room 814 1919 M Street, NW Washington, DC 20554 Hage this helps -

Dear Chairman Hundt:

The purpose of this letter is to express my concern about the impending loss of WWSB, Channel 40's affiliation with ABC here in Sarasota, Florida.

I don't protend to understand all of the details regarding ABC's recent decision to drop WWSB's affiliation. I don't know whether the decision was based on sound business rationale, or simply some complex quid pro quo arrangement with Scripps Howard which leaves the people of Sarasota "hanging out to dry".

I do know, however, that the loss of WWSB's ABC affiliation will be a severe blow to the people of Southwest Florida. We have relied on WWSB for 23 years to keep us informed about local and national events and they have done just that in a magnificent manner. In addition to their purely communications efforts, they are deeply and consistently involved in various community activities. WWSB has truly become an indispensable asset to the area and I believe their loss of affiliation with ABC will seriously and adversely affect their ability to provide the services we will continue to need.

One of the services which WWSB currently performs extremely well whose loss particularly concerns me is that of keeping the area residents updated on hazardous weather conditions. We live in a zone that is prone to hurricanes and other violent weather. It would be folly to assume that the same high level of timely hazardous weather reporting for our specific area will be available from a TV station in Tampa, or any local station not affiliated with a major broadcasting network. I would hope and expect the FCC to keep this critical fact in mind when deciding WWSB's fate insofar as its affiliation with ABC is concerned. The uniqueness of our location on the Gulf Coast, coupled with a complex evacuation plan, argues strongly that we have the very best in early warning of an approaching storm. WWSB has superbly demonstrated its ability to perform this vital function; I'm not confident that TV stations in the Tampa area would be as responsive as we might require. Moreover, their attention during such an event would be focused on the Tampa Bay area, and rightly so.

In sum, I believe that WWSB should retain its ABC affiliation and request the FCC take the necessary action to ensure that end.

Sincerely,

amo C. Powell

c/ſ

Sam Antar, Isq., Counsel for Capital Citles/ABC, Inc.
Donald P. Ziefang, Esq., Counsel for Scripps Howard Broadcasting, Inc.
Stan Crumley, President & General Manager, WWSB, Channel 40

Ernest F. Rico 454 Mondow Lark Drive Sarasota, Florida 34236

July 27, 1994

American Broadcasting System
ABC Audience Information
77 West 66th Street
New York, New York 10021

Gentlemen:

As you all are aware, the recent upheaval of television ownership and network affiliation in Tampa appears to have left the 275,000 residents of Sarasota County without a local station with a network affiliation.

We will continue to receive network programming via our cable system. What we wond have, however, is local news of any depth nor of more importance local weather Sarasota is subject to frequent storms of high intensity and is very vulnerable hurricanes.

In 1985, our local station was unprepared to report on a major hurricane in our area. We were forced to rely on Tampa television for advice and storm information leading to much confusion as to whether or not we were to evacuate. Subsequent criticiem of our local channel resulted in their upgrading weather forecasting to an excellent level. We now have superior emergency weather information available 24 hours during emergency conditions.

Of equal importance, assuming our local television station will not be financially viable without a network affiliation, will be the loss of our local news service. Our charitable institutions, our large arts community and our civic institutions will be unable to get their messages into the community via television. The local business community will have to buy a large audience in order to get their message into Sarasota if they can afford to do so.

For these and many other reasons I ask you to review our local problem in the light of our community needs.

It would appear the unilateral cancellation of a network contract for no cause by a major multi-station corporation for competitive purposes is against public policy.

Very truly,

urnest k. Kiç

co: Senator Graham Sonator Mack

Congressman Miller

Federal Communications Commission

<u>EXHIBIT 4</u> DECLARATION OF STANLEY B. CRUMLEY

Declaration of Stanley B. Crumley

My name is Stanley B. Crumley and I am President and General Manager of Southern Broadcast Corporation of Sarasota ("SBC"), licensee of Station WWSB(TV), Channel 40, Sarasota, Florida.

Station WWSB is located in the Sarasota, Florida Area of Dominant Influence ("ADI"). The Sarasota ADI is only comprised of Sarasota County, Florida. The United States Census locates Sarasota County in the Sarasota-Bradenton Metropolitan Statistical Area. This is separate and distinct from the Tampa-St. Petersburg-Clearwater Metropolitan Statistical Area. The Federal Communications Commission recognizes the separateness of the Sarasota-Bradenton MSA from the Tampa area. For example, EEO analysis for Sarasota stations is based on Sarasota-Bradenton labor force data, not Tampa-St. Petersburg-Clearwater labor force data.

The Sarasota ADI is the 153rd ranked television market in the United States. The Tampa-St. Petersburg ADI is the 16th ranked television market.

Since it went on the air in 1971, Station WWSB has been the ABC Television Network affiliate in Sarasota. Station WTSP-TV, Channel 10, St. Petersburg, Florida is the current ABC affiliate in the Tampa-St. Petersburg market.

Station WWSB is the only daily scheduled local television news in the Sarasota. In the past year the station has broadcast a

every day, seven days a week. WWSB programs Sarasota local news Monday through Friday at 7:25 - 7:30 a.m.; 8:25 - 8:30 a.m.; 12:00 - 12:30 p.m.; 5:30 - 6:00 p.m.; and 11:00 - 11:30 p.m. as well as five news breaks throughout the day. On Saturday and Sunday, WWSB airs Sarasota local news at 6:30 - 7:30 p.m. and 11:00 - 11:30 p.m. WBSV, Channel 62, licensed to Venice, provides only sporadic news breaks during prime time. Several television stations licensed to Tampa - St. Petersburg, including WFTS, do not provide any news about Sarasota, and WTVT, Tampa, airs approximately one news story per day regarding Sarasota.

Station WWSB's severe weather coverage is particularly important to Sarasota. The Station's weather team has been called upon for fast accurate information during Hurricane Andrew, Tropical Storm Floyd and last March's severe "No Name Storm."

Station WWSB airs public affairs programming and public service announcements for community events, projects and public awareness throughout the Sarasota market. In the last year it aired over 1900 local public service announcements. Additionally, Station WWSB participates in dozens of community projects, special events and sponsorships each year in Sarasota.

Recent events, unrelated to Station WWSB's performance as the ABC Network affiliate in Sarasota, Florida threaten the financial ability of Southern Broadcast Corporation of Sarasota to continue providing high quality local service to the Sarasota ADI. Specifically, the ABC Television Network reached an agreement with

Scripps Howard Broadcasting Company ("Scripps") to acquire long-term affiliations in the Detroit, Cleveland, Baltimore, Phoenix and Tampa-St. Petersburg markets. In the Tampa-St. Petersburg market the ABC network will move from WPST, Channel 10, to Scripps' station WFTS, Channel 28, Tampa. I have been informed by representatives of Capital Cities/ABC, Inc. that as part of the multi-station affiliation transaction, Scripps sought and received ABC's agreement to terminate WWSB's ABC Network affiliation in the Sarasota ADI.

I learned of the loss of wwsb's ABC affiliation at approximately 8:35 a.m. on Thursday, June 16, 1994. I received a call from George Newi, ABC's Executive Vice President in charge of affiliate relations. At first he confirmed what was already public information, that ABC and Scripps had reached agreements to continue to affiliate in Detroit and Cleveland. Mr. Newi also advised that in return ABC gave Scripps the ABC affiliation in Phoenix and in Tampa, as well as in Baltimore. As he continued, Mr. Newi advised me that as part of the deal, Scripps required that the ABC affiliation of Sarasota station WWSB, be withdrawn.

I explained to Mr. Newi how astonished I was and repeated to him conversations that I had with Krys Keller of ABC's affiliate relations in the past few weeks and how ABC assured me that we were okay and that our affiliation was safe.

Mr. Newi acknowledged that he was aware of those conversations with Krys Keller. However, this disaffiliation was "part of the deal with Scripps" and that they (ABC) had to do what was necessary

to protect themselves in other markets from CBS.

Later that afternoon, I again called Mr. Newi again at ABC. He was not then available. He returned my call that evening to my home at approximately 7:20 p.m. I discussed with Mr. Newi numerous reasons WWSB was more valuable than ever with WFTS' (Scripps) poor location on the area cable channels. I also pointed out that while WFTS had no news at all, WWSB had an excellent newscast and that without us, ABC's numbers would suffer. George agreed but stated it was out of his control and he felt Scripps was "firm on this position."

On Saturday, June 18, SBC's director, Robert Nelson called Leonard Goldenson, a current member of ABC's Board of Directors and its past President. Mr. Nelson asked Mr. Goldenson, a resident of Longboat Key, Florida for a meeting. Mr. Goldenson agreed to meet with Mr. Nelson and me at 4:00 p.m. on Saturday, June 18, 1994, at his residence.

At the meeting, Mr. Nelson and I appealed to Mr. Goldenson for any assistance he could possibly give us. Mr. Goldenson stated that he had spoken with Tom Murphy, President of Capital Cities/ABC and Mr. Murphy said there was nothing that he could do and that Sarasota's (WWSB) continued affiliation was a "deal breaker" in the overall Scripps/ABC deal.

I questioned Mr. Goldenson about that statement and specifically asked how the Sarasota market with \$3.5 million in annual national revenue vs. \$190 Million in annual revenue for the Tampa market could possibly be considered significant enough to be

a "deal breaker." He listened sympathetically but again stated only that Mr. Murphy had conveyed to him that WWSB's continued affiliation was a "deal breaker."

Scripps' agreement with ABC to terminate WWSB's the ABC affiliation will dramatically alter the amount and the allocation of WWSB's programming funds. The station will lose millions of dollars in annual revenue. Its operating costs will substantially increase because the station must purchase syndicated programs to replace lost network programs. Overall, the station will have a less money to spend on local news and public affairs and its ability to serve Sarasota will, necessarily, suffer.

I declare under penalty of perjury that the facts set out above are true.

5

<u>EXHIBIT 5</u> DECLARATION OF GEORGE H. NEWI

Declaration of George H. Newi

My name is George H. Newi. I am Executive Vice President, Affiliate Relations, for the ABC Television Network.

- 1. I am in charge of the department that manages the network's relationship with its affiliated stations. In that capacity, I make recommendations to the president of the network group, Mr. Robert Iger, concerning affiliation and disaffiliation decisions. When I was informed by Mr. Iger that the company would be undertaking negotiations with Scripps Howard Broadcasting Company ("Scripps"), I reviewed all the markets in which Scripps owns television stations.
- 2. As part of my review, I examined the Tampa-St. Petersburg-Sarasota market. The network is currently affiliated in that market with both WTSP and WWSB. My recommendation to Mr. Iger was that if an ABC affiliation with WFTS was part of the overall deal with Scripps we should disaffiliate WWSB because of the excessive duplication it would entail.
- 3. I have read Stanley Crumley's Declaration (Exhibit B to the Southern Broadcast Corporation of Sarasota's ("SBC") Formal Petition for Order to Show Cause). The Declaration deals in part with two conversations I had with Mr. Crumley on June 16, 1994.

- 4. I disagree with Mr. Crumley's account of those conversations, in particular with the statements Mr. Crumley attributes to me. In the paragraphs below, I set forth my best recollection of my conversations with Mr. Crumley, and specifically, the statements I made to him.
- 5. In my first conversation with Mr. Crumley on the morning of June 16, 1994, I informed him that ABC and Scripps had entered into affiliation agreements for five markets and that WFTS in Tampa was part of the deal with Scripps. I told him that since WFTS substantially duplicates WWSB's signal, ABC had decided to disaffiliate WWSB. I never told Mr. Crumley in that conversation or at any other time that Scripps "required" the disaffiliation of WWSB or that disaffiliation with WWSB was "part of the deal" with Scripps. To my knowledge, the disaffiliation decision was independently made by ABC.
- of the 16th. In that conversation, Mr. Crumley argued the case for a continued ABC affiliation with WWSB. I told him that we had carefully examined the Tampa/St. Petersburg/ Sarasota market and that, with WFTS providing us adequate network coverage in Sarasota, we saw no need to continue with WWSB.
- 7. Mr. Crumley called me again the morning of June 20. When I called him back, he proceeded to characterize Scripps' conduct as "predatory". I told him he was sounding as if he was making a legal claim and that, since I was not a lawyer, I would not discuss that with him.

8. Mr. Crumley called me again sometime during the week of the 20th to ask for a meeting with Tom Murphy. I called him back later the same day and told him in substance that I saw no point in such a meeting since ABC's decision was based on its assessment of the overlap between WFTS and WWSB and that a meeting could not change the underlying facts.

I declare under penalty of perjury that the facts set out above are true.

George H. Newi

July 22, 1994

EXHIBIT 6 DECLARATION OF LOUIS R. DUTREIL

TECHNICAL STATEMENT PREPARED FOR SOUTHERN BROADCASTING CORP. OF SARASOTA TELEVISION STATION WWSB SARASOTA, FLORIDA

This statement and the attached maps were prepared on behalf of Southern Broadcasting Corp. of Sarasota, licensee of television station WWSB Sarasota, Florida. Station WWSB operates on Channel 40 employing effective radiated power of 2880 kilowatts and antenna height above average terrain of 235 meters. Station WWSB is currently affiliated with the ABC Television Network. Sarasota ADI is ranked 153 by the Arbitron Television Markets and Rankings Guide.

Other television stations affiliated with ABC which have Grade B coverage in Sarasota County are WSTP St. Petersburg (Channel 10) and WEVU Naples (Channel 26). ABC affiliation will shortly change from WSTP and WWSB to WFTS Tampa (Channel 28). This change will result in ABC coverage loss in Sarasota County.

The attached map, Figure 1, shows the Grade A contours of WFTS and WWSB, the only television Grade A contours carrying ABC Network programming which reach Sarasota County. With the change in ABC affiliation, Sarasota County will lose ABC coverage affecting 62,709 persons residing on a land area of 718 square kilometers. As Sarasota County contains 277,776 persons on a land area of 1,481 square kilometers, according to the 1990 Census, the Grade A coverage loss amounts to 22.6 percent of the

__ A Subsidiary of A. D. Ring, P.C.

Page 2 Sarasota, Florida

Sarasota County population and 48.5 percent of the land area.

Figure 2 shows the Grade B contours of WFTS, WWSB and WENU and the ABC Network loss area after change of network affiliation. Within the ABC network Grade B loss area reside 16,663 persons on a land area of 135 square kilometers. These losses represent 6.0 percent of the population and 9.1 percent of the land area within Sarasota County.

Signal strength contours were computed in accordance with 47 CFR 73.684. Terrain roughness correction factors were not considered in the calculation of contours.

The average terrain elevations from 3 to 16 kilometers from the transmitter sites were obtained from the N.G.D.C. computer database. Eighteen evenly spaced radials were used for determining the average elevations and distances to coverage contours. Directional antenna pattern information was obtained from the FCC computer database.

Distances to the Grade A and Grade B contours were determined by employing the propagation curves of 47 CFR 73.699, using the antenna radiation center height above average terrain and the effective radiated power in the individual radial directions.

The population in Grade A or Grade B loss areas were determined by a computer program which adds the populations of the census districts whose centroids lie

A Subsidiary of A. D. Ring, P.C.

Page 3 Sarasota, Florida

within the contour. The 1990 census was employed. ..Land areas were determined by use of a polar planimeter, taking into account the appropriate map scale factor.

I declare under penalty of perjury that the facts contained herein are true and correct to the best of my knowledge and belief.

Louis R. du Treil

du Treil, Lundin & Rackley, Inc. 240 N. Washington Blvd., Suite 700 Sarasota, Florida 34236 (813)366-2611

July 5, 1994